

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NEBRASKA**

IN THE MATTER OF:	)	BK. NO. 24-40384
	)	
WILLIE LANE SHANNON, JR.	)	CHAPTER 13
SSN: ###-##-9262	)	
LAURA M. SHANNON	)	
SSN: ###-##-9249	)	
	)	
Debtors.		

**TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN (Doc 29)**

COMES NOW, ERIN M. MCCARTNEY, Chapter 13 Trustee, and objects to confirmation of the plan pursuant to 11 U.S.C. § 1324 and Neb. R. Bankr. P. 3015-3(B) for the following reason(s):

1. The claim filed by the Internal Revenue Service suggests the Debtors have not filed all required returns for 2021.
2. The claim filed by the Nebraska Department of Revenue suggests the Debtors have not filed all required returns for 2021.
3. The amended plan does not provide treatment for the secured claim filed by the Nebraska Department of Revenue.
4. The amended plan does not provide treatment for the secured claim filed by Wells Fargo Bank, N.A.
5. It appears the Debtor's income on Schedule I is understated based on additional awards/bonuses received by the Debtor.
6. Based on claims filed, the plan is severely underfunded.
7. The amended plan proposes to pay over \$20,000 for the retention of a 2022 Indian Challenger. It appears this vehicle may not be usable during all months of the year as a mode of transportation and the Debtors own a 2012 GMC Terrain that appears available for use. Since the plan is not sufficiently funded, it appears this recreational vehicle is causing the plan to not be feasible.

WHEREFORE, Trustee prays that the Trustee's Objection to Confirmation be sustained.

DATED: August 7, 2024

s/ Erin M. McCartney  
Erin M. McCartney #23663  
Chapter 13 Trustee  
13930 Gold Circle, Suite #201  
Omaha, NE 68144  
(402) 697-0437  
1-800-884-0437

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the Trustee's Objection was served on CHRISTOPHER J GAMM, debtors attorney, via the CM/ECF system of the United States Bankruptcy Court and a copy was mailed on August 7, 2024, by first-class, U.S. mail, postage prepaid to the Debtors at the addresses listed below:

WILLIE LANE SHANNON, JR.  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

LAURA M. SHANNON  
7548 WHITLOCK PLACE  
LINCOLN, NE 68516-5786

s/ Erin M. McCartney  
Erin M. McCartney